

**LEE Peter Y**

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**From:** Miyamoto, David T. <david.miyamoto@squirepb.com>  
**Sent:** Thursday, February 27, 2020 1:13 AM  
**To:** LEE Peter Y  
**Cc:** Kim Jisang; Yaegashi, David T.  
**Subject:** RE: Re: Activity in Case 1:19-cv-09496-GBD Sungjin Inc Co., Ltd. et al v. Bag Studio, LLC et al Memo Endorsement

Peter,  
We'll give you a call at 8:30pm your Thursday evening.  
Thanks,  
David

-----Original Message-----

From: Miyamoto, David T.  
Sent: Wednesday, February 26, 2020 3:31 PM  
To: 'LEE Peter Y' <peter.lee@leeadvocates.com>  
Cc: Kim Jisang <legal@jikimlaw.com>; Yaegashi, David T. <david.yaegashi@squirepb.com>  
Subject: RE: [EXT] Re: Activity in Case 1:19-cv-09496-GBD Sungjin Inc Co., Ltd. et al v. Bag Studio, LLC et al Memo Endorsement

Hi Peter,  
Let's talk your Thursday evening. We'll email you tomorrow with a proposed time.  
Thanks,  
David M

-----Original Message-----

From: LEE Peter Y <peter.lee@leeadvocates.com>  
Sent: Wednesday, February 26, 2020 12:39 PM  
To: Miyamoto, David T. <david.miyamoto@squirepb.com>  
Cc: Kim Jisang <legal@jikimlaw.com>; Yaegashi, David T. <david.yaegashi@squirepb.com>  
Subject: [EXT] Re: Activity in Case 1:19-cv-09496-GBD Sungjin Inc Co., Ltd. et al v. Bag Studio, LLC et al Memo Endorsement

David, how is Wednesday after 7 PM EST?  
or Thursday after 6 PM EST?

> On Feb 24, 2020, at 21:48, Miyamoto, David T. <david.miyamoto@squirepb.com> wrote:

>  
> Peter,  
>  
> What day(s) this week are you available for such a call? We believe (as you indicate you do as well) that we should talk, whether or not Bag Studio and Horowitz appoint new counsel (and thus irrespective of the Court's moving Cliff Katz's motion to withdraw to March 3rd).  
>  
> Regards,  
> David M  
>

> -----Original Message-----

> From: Lee, Peter Y. <peter.lee@leeadvocates.com>  
> Sent: Friday, February 21, 2020 10:32 PM  
> To: Miyamoto, David T. <david.miyamoto@squirepb.com>  
> Cc: Kim Jisang <legal@jikimlaw.com>; Yaegashi, David T.  
> <david.yaegashi@squirepb.com>  
> Subject: [EXT] RE: Fwd: Activity in Case 1:19-cv-09496-GBD Sungjin Inc  
> Co., Ltd. et al v. Bag Studio, LLC et al Memo Endorsement

>

> Good morning/evening David

>

> Whether or not BS/Horowitz have new counsel and play ball by early next week, let's chat next week re dates to submit to the court.

>

> I've discussed the case with the client, in some detail. Any friendly, and fair, resolution will require some discovery, not necessarily limited to BS/Horowitz and Itochu vis-a-vis LeSportsac. At this point, plaintiffs don't even know if BS/Horowitz was the only licensee or distributor for Le Sportsac or other Itochu branded products: If not, the question whether ANY such licensee or distributor made ongoing royalty payments, or the like, to Itochu is certainly a legitimate discovery inquiry, among many others, because it will illustrate Itochu's intent.

>

> I understand Itochu may rely on one agreement with BS/Horowitz to move to dismiss the complaint. However, I think I have enough emails to/from Itochu entities to survive such a motion and move discovery along.

>

> Talk soon.

>

>

>> ----- Original Message -----

>> Subject: RE: Fwd: Activity in Case 1:19-cv-09496-GBD Sungjin Inc Co.,  
>> Ltd. et al v. Bag Studio, LLC et al Memo Endorsement  
>> From: "Miyamoto, David T." <david.miyamoto@squirepb.com>  
>> Date: Thu, February 20, 2020 9:23 pm  
>> To: "LEE Peter Y" <peter.lee@leeadvocates.com>  
>> Cc: "Kim Jisang" <legal@jikimlaw.com>, "Yaegashi, David T."  
>> <david.yaegashi@squirepb.com>

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>> Peter,

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>> Thanks for forwarding the case update and noted about the initial status conference being adjourned to March 24th.

>>

>>

>>

>> We assume you'll be in touch sometime next week once the Court rules on the OTSC regarding Cliff Katz's motion to withdraw, as you indicated in your email of January 31st to us, so we can have the discussions necessary to comply with procedural rules. In that regard, Monday February 24th is a holiday here in Japan (and basically your Sunday in any event), but we should generally be available for a call during your evenings the rest of the week. We do think it makes sense to have a chat about the case including where you see things going, our clients' responses to the Complaint, and issues related thereto.

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>> Regards,  
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>> David M  
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>> From: LEE Peter Y <peter.lee@leeadvocates.com>  
>>  
>> Sent: Thursday, February 13, 2020 10:42 AM  
>>  
>> To: Yaegashi, David T. <david.yaegashi@squirepb.com>; Miyamoto, David  
>> T. <david.miyamoto@squirepb.com>  
>>  
>> Cc: Kim Jisang <legal@jikimlaw.com>  
>>  
>> Subject: [EXT] Fwd: Activity in Case 1:19-cv-09496-GBD Sungjin Inc  
>> Co., Ltd. et al v. Bag Studio, LLC et al Memo Endorsement  
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>> FYI  
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>> Begin forwarded message:  
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>> From:  
>> NYSD\_ECF\_Pool@nysd.uscourts.gov<mailto:NYSD\_ECF\_Pool@nysd.uscourts.go  
>> v  
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>> Date: February 12, 2020 at 11:37:27 EST  
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>> To: CourtMail@nysd.uscourts.gov<mailto:CourtMail@nysd.uscourts.gov>  
>>  
>> Subject: Activity in Case 1:19-cv-09496-GBD Sungjin Inc Co., Ltd. et  
>> al v. Bag Studio, LLC et al Memo Endorsement  
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>> This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail  
because the mail box is unattended.  
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and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if

receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

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>> U.S. District Court  
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>> Southern District of New York  
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>> Notice of Electronic Filing  
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>> The following transaction was entered on 2/12/2020 at 11:36 AM EST  
>> and filed on 2/12/2020  
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>> Case Name:  
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>> Sungjin Inc Co., Ltd. et al v. Bag Studio, LLC et al  
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>> 1:19-cv-09496-GBD<<https://ecf.nysd.uscourts.gov/cgi-bin/DktRpt.pl?524>  
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>> Docket Text:  
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>> MEMO ENDORSEMENT on re: [28] LETTER addressed to Judge George B.  
>> Daniels from Peter Lee dated 2/7/2020 re: Request to Adjourn  
>> 2/25/2020 Pretrial Conference (ECF 15). Document filed by Sungjin Inc  
>> Co., Ltd., Sungjin Inc Vina Co. Ltd. ENDORSEMENT: So ordered. The  
>> initial conference scheduled for February 25, 2020 is adjourned to  
>> March 24,  
>> 2020 at 9:30 a.m. (Initial Conference set for 3/24/2020 at 09:30 AM  
>> before Judge George B. Daniels.) (Signed by Judge George B. Daniels  
>> on  
>> 2/12/2020) (rjm)  
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>> 1:19-cv-09496-GBD Notice has been electronically mailed to:  
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>> Peter Y Lee peter.lee@leeadvocates.com<mailto:peter.lee@leeadvocates.com>,  
leepym3@gmail.com<mailto:leepym3@gmail.com>  
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>> Jisang Kim attorneyjskim@gmail.com<mailto:attorneyjskim@gmail.com>  
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>> 1:19-cv-09496-GBD Notice has been delivered by other means to:  
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>> The following document(s) are associated with this transaction:  
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>> Document description:Main Document  
>>  
>> Original filename:n/a  
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>> Electronic document Stamp:  
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>> [STAMP dcecfStamp\_ID=1008691343 [Date=2/12/2020]  
>> [FileNumber=23556996-  
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>> [85e112ab6ec5f43abb4639e12f46e2426244d568ca5de2f870443f4058ac9c5fb0  
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